

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO.: 05-CV-11806-RWZ

JODY REILLY,

Plaintiff,

v.

THOMAS ROBBINS, as Colonel of the  
Massachusetts State Police  
Defendants

**SUPPLEMENTAL JOINT CONFERENCE STATEMENT  
AND REQUEST FOR COURT FOR APPROVAL**

The parties jointly submit this Supplemental Joint Conference Statement, and request that this Honorable Court approve the deadlines set forth below.

**I. Joint Discovery Plan**

A. Service of Automatic Required Disclosures Pursuant to Rule 26(a)(1): September 15, 2006

Status: Completed.

B. Amendment to pleadings: October 15, 2006

Status: Completed.

C. Written Discovery completed by: August 15, 2007

**1. Interrogatories:**

30 per party, otherwise consistent with FRCP and Local Rules

Status:

**(a). Plaintiff's Interrogatories to Defendant**

Timely served. The Defendant will serve pertinent answers no later than August 31, 2007.

**(b). Defendant's Interrogatories to Plaintiff:**

Timely served. Plaintiff will respond no later than October 15, 2007.

**2. Requests for Production of Documents:**

Consistent with FRCP and Local Rules

**Status:**

**(a). Plaintiff's Requests for Production of Documents to Defendant**

Timely served. The Defendant will serve pertinent responses no later than August 31, 2007.

**(b). Defendant's Requests for Production of Documents**

Timely served. Plaintiff will respond no later than October 30, 2007.

**3. Requests for Admissions:**

Consistent with FRCP and Local Rules

**Status:**

**(a). Plaintiff's Requests for Admissions**

Consistent with FRCP and Local Rules

Timely served. Defendant will respond no later than September 17, 2007.

**D. Non-expert depositions completed by: November 15, 2007**

Depositions: max. 12 each (not including experts or keeper of records)

**Status Update:** Service of deposition notices completed.

**(a). Plaintiff's Deposition List.**

Plaintiff served timely notice to depose seven current or former Massachusetts State Police Employees. Because of deponents' availability, depositions will be conducted within the next two months.

In an attempt to reduce the number of depositions, plaintiff has proposed to conduct the depositions in two stages, as follows:

1. First stage: Depose Lt. Christine Bernard McNamara (ret.); Major Thomas McGillivray (ret), Col. Thomas Foley (ret.), and Maj. Michael Concannon.

2. Second stage - After the first stage, plaintiff will assess whether she needs to depose Capt. Donald Baima (ret), Lt. Michael Barry, and/or

Eleanor Sinnott (former general counsel of the Massachusetts State Police).

As to the possible deposition of former MSP attorney Eleanor Sinnott, the parties have discussed the areas of inquiry, thus seeking to narrow any pertinent issues. The parties will continue to make every effort to avoid court intervention if the plaintiff decides to depose Eleanor Sinnott as set forth in the preceding paragraph. Possibilities include an assented-to protective order motion and further discussion of the general areas of inquiry.

**(b).Defendant's Deposition List**

Defendant duly noticed the plaintiff's deposition, scheduled for the agreed upon date of September 14, 2007.

- E. Plaintiff's trial experts disclosed by: January 15, 2008
- F. Defendant's trial experts disclosed by: February 15, 2007
- G. Depositions of plaintiff's experts completed by: March 15, 2008
- H. Depositions of defendant's experts completed by: April 15, 2008
- I. Dispositive motions filed by: May 30, 2008
- J. Final pre-trial conference held by: September 15, 2008
- K. Trial: Post – September 17, 2008

**II. Proposed Schedule for Filing of Dispositive Motions**

- A. See Section I. above.

Respectfully submitted,

JODY REILLY,  
by her attorney,

THOMAS ROBBINS as Colonel of the  
Massachusetts State Police  
By its attorneys,

MARTHA COAKLEY  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). There are no non-registered participants in this action.

/s/ Julie K. Peterson  
Julie K. Peterson